

NETWORK DEPOSITION SERVICES

Transcript of Alan Hall

1

1 IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

2

3 ROBERT STOUD, :
4 Plaintiff :IN THE COURT OF COMMON
5 vs. :PLEAS OF LACKAWANNA
6 SUSQUEHANNA COUNTY, :COUNTY
7 COMMISSIONER ELIZABETH :JURY TRIAL DEMANDED
8 ARNOLD, AND :
9 COMMISSIONER MARYANN :NO. 3:17-CV-2183
WARREN :
Defendants :
:

10 — — —

11 DEPOSITION OF ALAN HALL

12 Thursday, December 10, 2020

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14

The deposition of ALAN HALL, called as a
witness by the Plaintiff, pursuant to notice and
the Pennsylvania Rules of Civil Procedure
pertaining to the taking of depositions, taken
before me, the undersigned, Trisha Sims, a Notary
Public in and for the Commonwealth of
Pennsylvania, at the offices of Mazzoni, Karam,
Petorak & Valvano, Bank Towers, Suite 201,
321 Spruce Street, Scranton, Pennsylvania 18503,
on Thursday, December 10, 2020, commencing at
10:31 a.m., the day and date above set forth.

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23 NETWORK DEPOSITION SERVICES
24 SUITE 1101, GULF TOWER
25 707 GRANT STREET
26 PITTSBURGH, PENNSYLVANIA 15219
27 412-281-7908

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1 APPEARANCES:

2

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11 -- Representing the Plaintiff

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21 -- Representing the Defendants

22

23

24 16 ALSO PRESENT:

25 17 Robert Stoud

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* * *

2 (It is stipulated by and between
3 counsel for the respective parties that the
4 reading, signing, certification, sealing and
5 filing of the deposition is waived and that all
6 objections, except as to the form of the question,
7 are reserved until the time of trial.)

8

* * *

9

ALAN HALL,

10 having been duly sworn or affirmed, was examined
11 and testified as follows:

12

EXAMINATION

13

BY MR. KARAM:

14

Q. Would you state your name for the
record?

16

A. Alan Hall, A-L-A-N, H-A-L-L.

17

Q. And, Mr. Hall, how are you employed?

18

A. County commissioner, Susquehanna
County. Plus, I'm a real estate agent.

20

Q. Okay. And how long have you been a
county commissioner for Susquehanna County?

22

A. Nine years now.

23

Q. I'm going to be asking you some
questions. We've done this before in terms of me
taking your deposition. It's going to be the same

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1 thing.

2 If you don't hear my question, let me
3 know. If you don't understand my question, let me
4 know. Otherwise, I'm going to assume that you've
5 heard and understood the question.

6 Okay?

7 A. Okay.

8 Q. We have the stenographer here, and the
9 stenographer is going to take down everything that
10 we say. She can't take down a nod of the head or
11 any physical gestures. So I'd ask that all your
12 responses be verbal.

13 A. All right.

14 Q. We're here just for a narrow purpose
15 today, in that we've already taken your
16 deposition; and that narrow purpose is, there was
17 a complaint that was filed in the United States
18 District Court for the Middle District of
19 Pennsylvania by Michael Giangrieco --

20 A. Okay.

21 Q. -- that alleged that falsehoods were
22 being filed and falsehoods were being portrayed by
23 representatives of Susquehanna County. That's
24 what we're here for today.

25 Okay?

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1 A. Okay.

2 Q. So I'm going to hand you what --
3 something that was sent to me yesterday by
4 Attorney Hailstone. We're going to mark this as
5 Plaintiff's Exhibit 1, and I'm going to give that
6 to you.

7 (Plaintiff's Exhibit 1, Letter written
8 by Alan Hall, was marked for identification.)

9 BY MR. KARAM:

10 Q. And are you familiar with that
11 document?

12 A. I have to read it now and let you know.

13 Q. Okay. Take your time.

14 (Pause in proceedings.)

15 THE WITNESS: Okay.

16 BY MR. KARAM:

17 Q. Are you familiar with that document?

18 A. Yes, I am.

19 Q. Do you know who the author of that
20 document is?

21 A. I am.

22 MR. HAILSTONE: Before we get into it,
23 just for the record, I object to the use of this
24 document. It's attorney work product,
25 attorney-client work product, and it's privileged;

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1 and I need to put that objection on the record.

2 I also note that when I sent it to
3 Attorney Karam, I noted that there was an
4 objection to the use of these documents; but I
5 think out of a need to get to the bottom and be
6 done with this issue, I sent it anyway.

7 MR. KARAM: And that's accurate. So we
8 can proceed.

9 BY MR. KARAM:

10 Q. Who did you send this to?

11 A. It originally was sent to the CCAP
12 claims adjuster.

13 Q. Do you know the CCAP claims adjustor's
14 name?

15 A. There was three of them. The two of
16 them I remember was Cassie Troup and Jennifer
17 Ulsh.

18 Q. And you don't recall the third one?

19 A. I don't recall the third.

20 Q. And was this also sent to Attorney
21 Robin Read?

22 A. I did not send it to Robin Read.

23 Q. And I take it that if you authored this
24 and this was sent to the CCAP adjustors that you
25 believe everything contained in this is truthful?

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1 A. My opinion, yes.

2 Q. What caused you to write this letter?

3 A. The position -- as it says in the first
4 paragraph, the position paper that was drafted by
5 Robin Read I didn't agree with. I felt that it
6 left out certain facts and was misleading.

7 Q. Okay. When did you send this?

8 A. I can't recall the exact date. It was
9 probably within a month after she filed the
10 position paper.

11 Q. And by what means did you send this to
12 the claims adjustors at CCAP?

13 A. By personal email.

14 Q. So this was an email message?

15 A. Yes.

16 Q. Are you aware of any other emails that
17 you may have sent to CCAP as it relates to either
18 Robert Stoud or Maggie McNamara?

19 A. Not that I can recall.

20 Q. Did you discuss this email with anyone
21 else prior to sending it or subsequent to sending
22 it?

23 A. Discussion was with our Solicitor
24 Giangrieco and Commissioner Warren.

25 Q. And can you tell me about those

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1 discussions?

2 MR. HAILSTONE: Object to any
3 discussion with former Solicitor Giangrieco as
4 privileged.

5 BY MR. KARAM:

6 Q. You can go ahead.

7 A. As far as Commissioner Warren, it
8 was -- both of us had prepared documents, and we
9 reviewed each other's documents to make sure that
10 they were accurate in what we thought was the
11 basis.

12 Q. When you say "documents," you're
13 talking about this email?

14 A. This email, yes.

15 Q. So I'm going to show you what we're
16 going to mark as Plaintiff's Exhibit 2.

17 (Plaintiff's Exhibit 2, Letter written
18 by MaryAnn Warren, was marked for identification.)

19 BY MR. KARAM:

20 Q. And I would ask that you take the time
21 to review that and let us know if you're familiar
22 with that document.

23 (Pause in proceedings.)

24 THE WITNESS: Okay. Yes.

25 BY MR. KARAM:

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1 Q. Are you familiar with that document?

2 A. Yes, I am.

3 MR. HAILSTONE: Same objection as the
4 other document.

5 BY MR. KARAM:

6 Q. Can you tell me what it is?

7 A. This was the letter in response to the
8 position paper that MaryAnn Warren wrote.

9 Q. And you've reviewed it here today?

10 A. Uh-huh.

11 Q. And do you have any opinion on the
12 truthfulness of that document?

13 A. My opinion is that she wrote the
14 document based on her opinion as to the facts, as
15 well as I did.

16 Q. Okay. Okay. I'm going to hand you
17 what we're going to mark as Plaintiff's Exhibit 3.

18 (Plaintiff's Exhibit 3, Letter dated
19 5/13/17 written by Robin A. Read, Esquire, was
20 marked for identification.)

21 BY MR. KARAM:

22 Q. And I will say to you that this was a
23 May 13, 2017, letter that was sent and filed with
24 the EEOC in response to Robert Stoud's EEOC
25 complaint.

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1 A. Uh-huh. Yes.

2 Q. Are you familiar with that document?

3 A. Yes, I am.

4 Q. Okay. And is that the document that
5 your email is responding to?

6 A. Yes.

7 Q. And is that the document that your
8 email is indicating there's been falsehoods made?

9 A. I think I said -- my correct words
10 were, I said it's to clarify and correct
11 statements that have been made.

12 Q. In other words, there's incorrect
13 statements in Plaintiff's Exhibit No. 3, the
14 response?

15 A. Correct.

16 Q. The purpose of your email was to
17 correct inaccuracies or the incorrect statements
18 that were made in the May 13, 2017, response?

19 A. Correct.

20 Q. Outside of these emails and letters,
21 who did you talk to concerning the inaccuracies in
22 Plaintiff's Exhibit No. 3?

23 A. It was our Solicitor Mike Giangrieco,
24 Commissioner MaryAnn Warren, a brief conversation
25 with the HR director Jeanne Conklin and Jennifer

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1 Ulsh and Cassidy Troup from CCAP.

2 Q. Can you tell me about your
3 conversations with Jennifer Ulsh and Cassidy Troup
4 from CCAP? When did they occur, and what was the
5 context?

6 A. The conversation that myself and
7 Attorney Giangrieco had with Jennifer and Cassidy
8 about the position paper and that we felt that the
9 position paper needed to be clarified and that we
10 felt that there were statements in there that
11 didn't -- weren't accurate and needed to be
12 corrected. So that's pretty much what the
13 conversation was.

14 Q. What was their response?

15 A. Their response was -- at that time was
16 to -- they understood that we had a difference of
17 opinion and they felt, in their words, that their
18 attorney did what they were supposed to do and
19 they said that we should go along with the
20 document.

21 Q. Was it let known to Cassidy or --
22 Jennifer and Cassidy that you and MaryAnn
23 constituted a majority of the county commissioners
24 of Susquehanna County?

25 A. Yes.

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1 Q. And that as a majority -- well, what
2 does that mean to you, that a majority of the
3 county commissioners were indicating to CCAP that
4 a document was filed on behalf of the County of
5 Susquehanna that contained inaccuracies and needed
6 to be corrected?

7 A. Ask that question again.

8 Q. What does it mean to you -- strike all
9 that.

10 In the County of Susquehanna, if a
11 majority of the commissioners decide to handle a
12 legal case in a certain way and the minority wants
13 to handle it in a different way, who prevails, to
14 your understanding?

15 MR. HAILSTONE: I object. You're
16 asking questions about the authority of the
17 commissioners, the county commissioners. They
18 vote in public meetings. The majority wins out at
19 public meetings. We're not talking about a public
20 meeting or anything where votes were held.

21 MR. KARAM: Votes are held in executive
22 sessions on legal matters as well.

23 MR. HAILSTONE: Legal matters -- okay.
24 Have we established that there was a vote in an
25 executive session?

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1 MR. KARAM: No. I'm not there yet.
2 I'm not there yet. What I'm establishing is that
3 two county commissioners contacted CCAP and told
4 them that they filed a false document and that
5 CCAP is telling the county commissioners we really
6 don't care because we're just going to listen to
7 the minimum majority.

8 MR. HAILSTONE: You're misinterpreting
9 what he said.

10 BY MR. KARAM:

11 Q. Let me ask you that.

12 A. Let me clarify. First of all, this
13 isn't a county commissioners' decision. It's the
14 insurance company's decision. They're the ones
15 that handled this. That's what they're paid for,
16 not the county commissioners.

17 Q. Well, who --

18 A. You've got to let me finish.

19 Q. I want you to.

20 A. Okay. So the county commissioners are
21 under contract with CCAP. CCAP handles our
22 insurance, which this falls under our insurance.

23 When they have handle those, it's our
24 responsibility to allow them to handle the cases
25 the way they see fit.

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1 We are responsible to provide them the
2 information they request, any support; but come to
3 the end of the road, CCAP has a decision to make
4 as to how the case is done.

5 Q. And you have no role or input in how
6 CCAP handles the case?

7 A. Correct. Our role would be, if we
8 wanted to have control of the case, then CCAP
9 would bow out and the county commissioners would
10 have to take full responsibility for the case.

11 Q. And how about settlement of cases? Who
12 controls the settlement of cases? CCAP or the
13 county commissioners?

14 A. In the settlement, it depends on the
15 issue itself. In this case, in the original
16 agreement that CCAP made when we first started it
17 back in 2016 or '17, CCAP was paying for the whole
18 thing.

19 Q. So would the county commissioners have
20 input into whether a case would settle or not?

21 A. Only if the County Commissioners
22 Association came us to and asked us to pony up and
23 spend money.

24 Q. And are you aware if they did that in
25 this case?

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1 A. My understanding -- I was not involved
2 in the last negotiations. So I don't know what
3 happened. That was long before me.

4 Q. Why weren't you involved in the last
5 one?

6 A. Because there was a change in the
7 chairman at the County; and when the chairman
8 shift changed, the new chairperson decided that
9 they needed to be involved in it instead of me.

10 Q. But you're still a commissioner,
11 correct?

12 A. One out of three, yes.

13 Q. So let's get back to your conversation
14 with the CCAP people. Did they tell you that they
15 didn't believe what you wrote in your email?

16 A. I can't -- the exact words I can't tell
17 you; but the summary of it was that they
18 understand our position, but they believe that the
19 position that the attorney wrote was accurate.

20 Q. Did you ever talk to the attorney and
21 let her know that you believed her response was
22 inaccurate?

23 A. No, I did not.

24 Q. When you were talking to CCAP, it was
25 just you, Mike Giangrieco and the two adjustors,

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1 claims adjustors?

2 A. Well, there was somebody else from
3 CCAP. I don't know who else was on the phone, and
4 I can't remember if MaryAnn was with me at that
5 time or not.

6 Q. And how many times did you talk to CCAP
7 about this case?

8 A. About that incident, once.

9 Q. Did they ask you to sign off on their
10 position?

11 A. No. I've never signed off on anything.

12 Q. There came a point in time when Robin
13 Read, who was the counsel of record for the EEOC,
14 was relieved of her responsibilities of
15 representing Susquehanna County.

16 A. Uh-huh.

17 Q. Do you know why that happened?

18 A. Well, that was a decision CCAP made.
19 She was employed by CCAP. So they're the ones
20 that made the decision to remove her.

21 Q. Did you have any input into that? Did
22 you make any recommendations to that? Did you
23 have any conversations concerning that?

24 A. We did have a conversation with, again,
25 those individuals I mentioned before, Cassidy and

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1 Jennifer, that we didn't feel that she was
2 representing our county's best interest and we
3 wanted somebody else on the case.

4 Q. And why didn't you feel she was
5 representing your county in its best interest?

6 A. Because she had written a position
7 paper for the county that we weren't entirely
8 100 percent agreeing upon, nor did we ever see it
9 before she filed it.

10 Q. And what was Cassidy and Jennifer's
11 response to that?

12 A. They said at the time in the
13 conversation that they would review it; and then
14 later, we were notified that Attorney Hailstone
15 was running the case.

16 Q. So we just got these letters yesterday.
17 Prior to yesterday, can you tell me the entire
18 universe of people who were aware of your email
19 and MaryAnn Warren's email, or letter, whatever it
20 is? I'm assuming Mike Giangrieco was one.

21 A. Yes.

22 Q. Who else in the universe of people knew
23 about these letters?

24 A. Well, again, I couldn't answer that
25 question. I don't know who tells who and who

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1 Giangrieco told or anybody else.

2 Q. Just in terms of people you talked to
3 or communicated to anywhere, any time, from the
4 date you sent the email until today.

5 A. Well, of course, the people at CCAP and
6 Attorney Hailstone.

7 Q. Attorney Hailstone knew about these
8 letters?

9 A. Yes.

10 Q. When did he find out about the letters?

11 A. I can't tell you the exact date.

12 Q. Well, was it a week ago, a month ago, a
13 year ago?

14 A. It was awhile ago. I can't remember
15 the exact date.

16 Q. Was he given a copy of the letters?

17 A. He was sent an email with the
18 information.

19 Q. Who sent him the email?

20 A. I did.

21 Q. You sent him an email with a copy of
22 your email?

23 A. Yes.

24 Q. How about MaryAnn Warren's?

25 A. No. I didn't send hers.

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1 Q. To be fair, this was an email that was
2 sent to CCAP?

3 A. Right.

4 Q. It wasn't sent to Robin Read?

5 A. Correct.

6 Q. And it was from you, as a county
7 commissioner, to CCAP?

8 A. Correct.

9 Q. Other than Attorney Hailstone -- and,
10 again, this email was sent over a year ago?

11 A. I don't know the exact date.

12 Q. And are you able to retrieve that
13 email?

14 A. Yes.

15 Q. During any of these meetings, do you
16 recall anybody taking notes? When I say
17 "meetings," during your conversations with CCAP,
18 did anybody take notes?

19 A. Our conversations with CCAP were over
20 the phone. So I don't know what they were doing.

21 Q. But you didn't take notes?

22 A. No.

23 Q. Okay. And you're not aware of MaryAnn
24 Warren taking notes?

25 A. No.

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1 Q. In terms of Jeanne Conklin and MaryAnn
2 Warren, did you ever have any conversations with
3 them where they indicated that they felt they were
4 being pressured to lie?

5 A. No. I think they're -- I think if you
6 look at their letters -- I mean, if you look at
7 MaryAnn's letter, it would pretty much tell you
8 how she felt about it.

9 Q. I'm going to show you what we have
10 marked as Plaintiff's Exhibit 4, and I'm going to
11 purport to you that this is a letter or an email
12 dated June 15, 2017, from Jeanne Conklin. I would
13 ask that you review that.

14 (Plaintiff's Exhibit 4, Letter dated
15 6/15/17 from Jeanne Conklin, was marked for
16 identification.)

17 (Pause in proceedings.)

18 THE WITNESS: Okay.

19 BY MR. KARAM:

20 Q. Is there anything in that document that
21 you have knowledge is inaccurate?

22 A. I believe this represents Jeanne's
23 opinion, yes.

24 Q. But do you have any knowledge of any
25 inaccuracies contained in that letter?

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1 A. Not to my knowledge.

2 Q. Can we say the same about MaryAnn
3 Warren's letter?

4 A. What's that?

5 Q. That you're not aware of any
6 inaccuracies in MaryAnn Warren's letter, which
7 would be Plaintiff's Exhibit No. 2?

8 A. I believe both of them represent their
9 opinion of the facts that occurred.

10 Q. And you do not have any knowledge of
11 any inaccuracies in either of those letters?

12 A. Well, there's certain things in their
13 letters I wasn't a part of. So I wouldn't have
14 knowledge of those issues.

15 Q. So you have no knowledge of any
16 inaccuracies?

17 A. I have no knowledge of any
18 inaccuracies.

19 (Plaintiff's Exhibit 5, Complaint, was
20 marked for identification.)

21 BY MR. KARAM:

22 Q. Okay. I'm going to show you what we
23 have marked as Plaintiff's Exhibit No. 5. I'm
24 going to indicate to you that this is a complaint
25 that Michael Giancricco filed against Susquehanna

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1 County, Elizabeth Arnold and Judith Herschel.

2 I'm going to call your attention to
3 paragraph No. 11. It states: During Arnold's
4 first term as county commissioner, Mr. Giangrieco
5 spoke to her repeatedly about actions she was
6 taking that were not only contrary to Susquehanna
7 policy, but potentially exposed Susquehanna County
8 to liability and did ultimately cause the county
9 liability.

10 Do you have any knowledge regarding the
11 truthfulness of that allegation?

12 MR. HAILSTONE: I'm going to object.
13 This is not what Judge Mannion's order allowed.
14 Judge Mannion's order was very clear about the
15 allegations -- I think they're in 15 through 18 --
16 regarding his claim that he was told to lie or
17 Commissioner Arnold told him to lie.

18 This is clearly information that County
19 Solicitor Giangrieco should not be sharing because
20 it's protected by attorney-client privilege. He
21 had no right to do that.

22 BY MR. KARAM:

23 Q. You can answer.

24 A. What was your question?

25 Q. Is paragraph 11 true to your knowledge?

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1 A. I would say that you need to talk to
2 Mr. Giangrieco about that.

3 Q. Well, let me ask this: Were you aware
4 that Attorney Giangrieco spoke to her regarding
5 actions she was taking that were contrary to
6 Susquehanna County policy?

7 A. That's in the first deposition that we
8 did.

9 Q. Is that a yes?

10 A. The first deposition that you took from
11 me, we made a statement in there that, you know,
12 she had been given letters saying that, you know,
13 she needed to follow policies and not expose the
14 county to risk.

15 Q. Okay. Paragraph 15: The attorney for
16 the county's insurance company prepared documents
17 in response to the EEOC complaint which were false
18 and inaccurate and did not reflect the facts given
19 to her by Mr. Giangrieco and others.

20 To your knowledge, is that a truthful
21 statement?

22 A. Well, if Mr. Giangrieco feels that way,
23 it may be truthful to him.

24 Q. Well, let's take Mr. Giangrieco out of
25 that and let's put Commissioner Hall in the place

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1 of Mr. Giangrieco's name. Would that be an
2 accurate statement?

3 A. The statement was?

4 Q. The attorney for the county's insurance
5 company prepared documents in response to the EEOC
6 complaint which were false and inaccurate and did
7 not reflect the facts given to her by Commissioner
8 Hall.

9 A. I would say that the attorney for the
10 county's insurance company prepared the documents
11 in response to the EEOC complaint and that I felt
12 that they needed to be clarified and correct
13 statements needed to be made.

14 Q. Paragraph 17 indicates: Mr. Giangrieco
15 and other employees were asked to lie.

16 Are you aware of anyone, other than
17 Mr. Giangrieco, who was an employee of Susquehanna
18 County that was asked to lie?

19 A. Well, I guess the definition of lie
20 would be correct because you have Jeanne Conklin's
21 response here that said she was pressured in the
22 statement. You have MaryAnn Warren's saying that
23 she was pressured, and you had my statement that I
24 said that they told us that we needed to go along
25 with what they wanted to do.

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1 Q. Anybody other than those three?

2 A. No.

3 MR. KARAM: Okay. Let's take a
4 couple-of-minute break, and I think we're close to
5 the end.

6 (A brief recess was taken.)

7 BY MR. KARAM:

8 Q. Did Attorney -- are you aware or did
9 you have any discussions with Attorney Giangrieco
10 about him sending a letter or email similar to the
11 one that you sent and MaryAnn Warren sent and that
12 Jeanne Conklin sent?

13 A. The conversations that I recall with
14 him was that he had told us that -- I told him I
15 was thinking about writing a letter in response to
16 what we had found.

17 MR. HAILSTONE: Before you answer, I'm
18 going to put another objection on the record.
19 This is a discussion between an attorney and his
20 client, and you shouldn't be asking questions
21 regarding that. I object to it. You can answer.

22 THE WITNESS: So in that conversation,
23 I said, you know, I think I need to write a
24 letter; and Giangrieco, our solicitor at the time,
25 said, well, you guys should all write letters if

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1 you disagree. He said -- I can't remember at that
2 point whether he said he was going to or he wasn't
3 going to -- I'm trying to think that he said he
4 wasn't going to because he was a solicitor, but he
5 may have. I don't have any knowledge of it.

6 MR. KARAM: Okay. I have nothing else.

7 MR. HAILSTONE: No questions.

8 (Witness excused.)

9 (Deposition concluded at 11:13 a.m.)

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NETWORK DEPOSITION SERVICES
Transcript of Alan Hall

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1 C E R T I F I C A T E

2 COMMONWEALTH OF PENNSYLVANIA)
))
3 COUNTY OF MONROE)

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I, Trisha Sims, do hereby certify
that before me, a Notary Public in and for the
Commonwealth aforesaid, personally appeared ALAN
HALL, who then was by me first duly sworn or
affirmed to testify the truth, the whole truth,
and nothing but the truth in the taking of his/her
oral deposition in the cause aforesaid; that the
testimony then given by him/her as above set forth
was by me reduced to stenotypy in the presence of
said witness and afterwards transcribed by means
of computer-aided transcription.

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I do further certify that this
deposition was taken at the time and place in the
foregoing caption specified, and was completed
without adjournment.

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I do further certify that I am not a
relative, counsel or attorney of either party or
otherwise interested in the event of this action.

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IN WITNESS WHEREOF, I have hereunto set my
hand and affixed my seal of office on this
29th day of December, 2020.

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20 Trisha J. Sims, Notary Public
21 In and for the Commonwealth of Pennsylvania
22 My commission expires June 6, 2024

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